

APPENDIX B

DISCOVERY PLAN WORKSHEET

**Tier I Pre-Settlement Discovery
TO BE COMPLETED IN ALL CASES**

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations:

Completion date for Phase I Discovery
as agreed upon by the parties:

(See paragraph 7 of joint letter requirement)

Status conference TBD by the court:

(Generally 15 days post Tier I Discovery)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:
(Presumptively 15 days post status conference)

All fact discovery completed by:
*(Presumptively 9 months after deadline for
joining parties/amend the pleadings)*

Expert discovery completed by:
*(Presumptively 3 months after close of fact
discovery)*

Final date to take first step in dispositive motion practice:
*(Parties are directed to consult the District Judge's
individual rules regarding such motion practice.
(Presumptively 30 days after close of discovery)*

Joint Proposed Pretrial Order to be
submitted:
*(30 days after dispositive motion
practice deadline)*
